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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No. 3:18-cr-577-CRB

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO RULE 17  
SUBPOENAS : ORDER**

STIPULATION FOR EXTENSION OF TIME TO RESPOND TO  
RULE 17 SUBPOENAS Case No. 3:18-cr-577-CRB

1 Pursuant to Federal Rule of Criminal Procedure 45(b), Gary Szukalski, Rob Sass, and  
2 Nicole Eagan respectfully submit this stipulation for a sixty (60) day extension of time in which  
3 to produce documents requested by counsel for the United States in the above captioned matter.

4 On June 8, 2022, this Court issued Rule 17 Subpoenas to Testify and Produce Documents  
5 or Objects in a Criminal Case (the “Subpoenas”) to each of Gary Szukalski, Rob Sass, and Nicole  
6 Eagan (the “Subpoena Recipients”). The deadline to provide responsive documents is currently  
7 October 5, 2022. If the Court grants this stipulation, the response will instead be due Monday,  
8 December 5, 2022.

9 Counsel for the Subpoena Recipients informed counsel for the United States of their  
10 intention to seek this extension. The United States does not oppose and joins in this stipulation.  
11 The Subpoena Recipients have not made any prior requests for an extension of this deadline. In  
12 support of this stipulation, the Subpoena Recipients state the following:

13 1. There is good cause to grant this stipulation. While reserving all rights regarding  
14 objections to the subpoena, the Subpoena Recipients are engaged in discussions with the United  
15 States regarding the scope of documents sought by the Subpoenas.

16 2. In the interest of judicial efficiency and to allow time for these discussions to continue,  
17 the Subpoena Recipients request that this Court allow a 60-day extension of time in which to  
18 produce documents.

19 3. The United States has consented to the requested extension and would not be  
20 prejudiced if it were granted. Moreover, given that this matter is not yet set for trial, the  
21 extension sought will not delay the Court’s proceedings.

22 5. For the foregoing reasons, the Subpoena Recipients respectfully request that, in  
23 accordance with this stipulation, the time in which they may produce documents responsive to the  
24 Subpoenas be extended by sixty days, to and including December 5, 2022.

1 Dated: October 3, 2022

MORRISON & FOERSTER LLP

2  
3 By: /s/ Christine Y. Wong  
4 Christine Y. Wong

5 Attorney for Gary Szukalski

6 Dated: October 3, 2022

7  
8 By: /s/ Ted W. Cassman  
9 Ted W. Cassman

10 Attorney for Nicole Eagan

11 Dated: October 3, 2022

12 By: /s/ Thomas H. Bienert, Jr.  
13 Thomas H. Bienert, Jr.

14 Local Counsel for Rob Sass (Stephen James  
15 Binhak Pro Hac Vice Motion Imminent)

16 Dated: October 3, 2022

17 By: /s/ Adam A. Reeves  
18 Adam A. Reeves

19 Assistant United States Attorney

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MICHAEL RICHARD LYNCH and  
STEPHEN KEITH CHAMBERLAIN,

Case No. 3:18-cr-577-CRB

~~[PROPOSED]~~ ORDER EXTENDING  
TIME TO RESPOND TO RULE 17  
SUBPOENAS

[PROPOSED] ORDER EXTENDING TIME TO RESPOND TO  
RULE 17 SUBPOENAS  
Case No. 3:18-cr-577-CRB

SF:4938166

1 Defendants.

2  
3 **FOR GOOD CAUSE SHOWN**, based upon the facts set forth in the stipulation and the  
4 representations of the parties, the Court hereby grants Gary Szukalski, Nicole Eagan, and Rob  
5 Sass (the “Subpoena Recipients”) a sixty (60) day extension of time in which to produce  
6 documents in response to the June 8, 2022 Court issued Rule 17 Subpoenas to Testify and  
7 Produce Documents or Objects in a Criminal Case (the “Subpoenas”).

8 The Subpoena Recipients’ deadline to produce documents responsive to the Subpoenas is  
9 extended by sixty days, to and including December 5, 2022.

10 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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14 Dated: October 5, 2022

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16   
17 THE HONORABLE CHARLES R. BREYER  
18 United States District Judge  
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